

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ACI WORLDWIDE CORP.,

Plaintiff,

v.

KEYBANK NATIONAL ASSOCIATION,

Defendant.

CASE NO. 1:17-CV-10662-IT

MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT

Pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, Plaintiff ACI Worldwide Corp. (“ACI”), hereby moves this Court for leave to file a Second Amended Complaint, a copy of which is attached to the accompanying Memorandum in Support as Exhibit A. The proposed Second Amended Complaint adds the defendant’s parent company, KeyCorp, as a party and states more detailed allegations against both defendants that include additional causes of action. The deadline to freely amend pleadings expires after this date of filing, September 1, 2017, so there will be no prejudice to KeyBank by allowance of this motion. For these reasons, and for the reasons set forth in the accompanying Memorandum in Support, ACI respectfully requests that the Court permit it to file a Second Amended Complaint.

ACI WORLDWIDE CORP.

By its attorneys,

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DATED: September 1, 2017

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon Daniel R. Warren, James A. Slater, Daniel M. Kavouras, BakerHostetler LLP, 127 Public Square, Suite 2000, Cleveland, OH 44114, Counsel for KeyBank National Association by Electronic Court Filing on September 1, 2017.

/s/ Kevin T. Peters